# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

IN THE MATTER OF THE SEARCH OF

THE PREMISES COMMONLY KNOWN AS 9043 ALLINGTON MANOR CIRCLE WEST, FREDERICK, MARYLAND 21703 CASE NO.

18-1697 JMC

#### AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Richard P. Federico, being duly sworn, depose and state that:

### **PURPOSE OF THIS AFFIDAVIT**

- 1. This affidavit is made in support of an application for warrants to search the following (hereinafter referred to as the "TARGET LOCATIONS"):
  - a. The entire premises located at 9043 Allington Manor Circle West, Frederick, Maryland 21703, more specifically described in Attachment A-1, which is incorporated herein by reference (the "TARGET LOCATION").
- 2. The TARGET LOCATION is to be searched for evidence of violations of 18 U.S.C. § 2251(c)(1) (Production of Child Pornography) and 18 U.S.C. § 2252A(a)(5)(B) (Possession of Child Pornography) (the "TARGET OFFENSES").
- 3. I am familiar with the information contained in this affidavit based upon the investigation I have conducted and based on my conversations with other law enforcement officers who have engaged in numerous investigations involving child pornography. The information contained in this affidavit came from my own participation in the inquiry described herein, as well as from other law enforcement officers and other third parties.
- 4. Because this affidavit is being submitted for the limited purpose of securing search warrants, I have not included each and every fact known concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe

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that evidence of violations of the TARGET OFFENSE are located at the TARGET LOCATION further described in Attachment A-1.

#### PROBABLE CAUSE

- 5. On January 22, 2018, a Federal Bureau of Investigation Task Force Officer (TFO), while in an undercover capacity (UC), accessed a publicly available peer-to-peer file sharing program known by law enforcement to be used by individuals with a sexual interest in children from an Internet-connected computer. The UC queried his network of "friends" and observed that an individual utilizing the username of "Jjlango" was logged into the network
- 6. Given that the UC was "friends" with user Jjlango on the file-sharing program, he had access to Jjlango's shared folders, one of which the UC opened. In that folder, the UC saw pornography.
- 7. The UC then selected numerous files and downloaded the files directly from Jjlango's shared folders. Ultimately, the UC downloaded a total of 24 folders, which contained approximately 2600 depictions of child pornography and erotica, including the following files:
  - a. !!!!736.jpg: Prepubescent nude female straddling a nude adult male, while holding the male's penis.
  - b. 1969\_28\_04\_1/11\_48\_02.jpg: Nude prepubescent white female laying on her back spreading her vagina with one hand, while holding a vibrator in her other hand against her vagina.
  - c. 1506695863.jpg: This image is of what appears to be a nude teen, kneeling while spreading apart a prepubescent female's buttocks, who is standing. There is another female that appears to be in front of the standing prepubescent female and an unknown hand touching the standing prepubescent female's leg.
  - d. 1508606495.jpg: Apparent Southeast Asian descent prepubescent female straddling the lap of a Southeast Asian descent male. The female has her back against the male's stomach, both are nude while kissing. The adult male penis is not erect.
  - e. GAH140013.jpg: An older looking photograph of a white prepubescent female wearing a red hat and stockings. The prepubescent female is laying

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on her back with an adult white male in between her spread legs holding his penis near the prepubescent female's vaginal area.

- f. Phot0002.jpg: White prepubescent female without any upper clothing on and red underwear. The prepubescent female is performing fellatio on an adult male with an unknown arm reaching from behind the adult male and under his buttocks touching his scrotum area.
- g. V100.png: White prepubescent female is lying on her back, spreading her vagina, while an unknown person looks on. A laptop computer is between the female's legs that are spread.
- h. NXGX.jpg: Dark skinned prepubescent female holding an adult male's penis as he is ejaculating onto the prepubescent female's face, while her eyes are closed.
- i. GETRNJMKUiH.jpg: Prepubescent female performing oral sex on an adult male penis.
- j. IMG\_5824.jpg: Prepubescent female, nude, lying on her back with an adult male penis penetrating her vagina.
- k. -LING022.jpg: Adult male performing oral sex on a nude prepubescent female, who is lying on her back.
- 1. -JudyAn\_Set15\_160: Prepubescent female performing oral sex on an adult male.
- m. -WCPA5719.jpg: White prepubescent female sitting on the lap of an adult male. Both are nude and the adult male penis is penetrating the prepubescent female's vagina.
- 8. During the session, the UC determined the IP address of "Jjlango" to be 76.100.113.137. A subpoena was served to the Internet Provider (ISP) for that IP address, which was Comcast.
- 9. The subpoena return from Comcast revealed that during the time the UC conducted the above session, IP address was assigned to the following:

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a. Subscriber Name: Steven HASSAN

b. Service Address: 9043 Allington Manor, Frederick, Maryland 21703.

c. Billing Address: 9043 Allington Manor West, Frederick, Maryland

21703.

10. Law enforcement conducted searches through several databases and discovered that the two addresses were one in the same. The actual physical address is 9043 Allington Manor Circle West, Frederick, Maryland 21703.

- 11. On March 27, 2018, the Honorable Richard Sandy authorized a state search and seizure warrant for HASSAN's residence at 9043 Allington Manor Circle West, Frederick, Maryland for evidence relating to possession with intent to distribute child pornography.
- 12. During the execution of the warrant on April 3, 2018, law enforcement seized several pieces of digital evidence: a Toshiba Satellite Laptop Computer; a PNY 8 GB Black USB Thumb Drive; and an Apple iPad.
- 13. During the execution of the warrant, law enforcement conducted an onsite forensic preview of the **Toshiba Satellite Laptop Computer**, which revealed that it contained depictions of suspected child pornography, among other things. Moreover, HASSAN's daughter voluntarily spoke with law enforcement and told them that the laptop was owned and used by HASSAN
- 14. Law enforcement also conducted an onsite forensic preview of the PNY 8 GB

  Black USB Thumb Drive, which they located inside of the nightstand in HASSAN's bedroom.

  That preview also revealed the existence of suspected images of child pornography.
- 15. On April 13, 2018, the Honorable Stephanie A. Gallagher, United States Magistrate Judge, authorized a federal search and seizure warrant for Hassan's residence at 9043 Allington Manor Circle West, Frederick, Maryland 21703 for evidence relating to possession with intent to distribute child pornography.

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- 16. During the execution of the warrant on April 20, 2018, law enforcement seized various pieces of electronic evidence, including several telephones, computers, and a **Transcend** Secure Digital (SD) flash memory card.
- 17. On June 7, 2018, an HSI Computer Forensics Analyst (CFA), completed his forensic analysis of the digital evidence seized from both the state and federal warrants, and he discovered numerous depictions of child pornography on certain pieces of the media.
- 18. For example, the review of the **Toshiba Satellite Laptop Computer** revealed the existence on the computer of thousands of images of suspected child pornography, as well as the existence of the same a publicly available peer-to-peer file-sharing program that the UC referenced-above used to download the images of suspected child pornography. The review of the **PNY 8 GB Black USB Thumb Drive** likewise revealed the existence of numerous images of child pornography on the drive.
- 19. Finally, the review of the **Transcend Secure Digital (SD) flash memory card** revealed the images of suspected child pornography in the card's unallocated space that appear to depict HASSAN engaged in sexually explicit conduct with at least one minor. For example, one image depicts a prepubescent female of Asian descent, lying on her back with legs spread, and an adult male, who appears to be HASSAN, between her legs performing oral sex on her and grabbing her right breast. A second image depicts the same prepubescent female of Asian descent with her legs open, exposing her genitals, with an adult male, who appears to be HASSAN, supporting her legs with his face approximately eight to ten inches away from her exposed vagina.
- 20. Based on my familiarity with HASSAN's appearance, the individual engaging in sexually explicit conduct in the images is HASSAN. I have seen HASSAN in person and

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reviewed photos taken of him over various periods of time—from 2002 to present.

- 21. I also know that HASSAN is a former Department of State employee who was stationed in Manila, Philippines from 2010 to 2012. The metadata associated with the aforementioned images indicate that the photos were taken in January 2011 by a Sony model DSC-S3000 digital camera. Furthermore, also recovered from the **SD card** was at least one photo of HASSAN's family taken during January 2011. I am familiar with the appearance of HASSAN's family because I saw them during the execution of search warrants at HASSAN's residence.
- 22. On June 8, 2016, during a review of pictures taken during the execution of the warrant on April 20, 2018, I saw what appeared to be a silver Sony model DSC-3000 digital camera located in the nightstand next to HASSAN's bed. In another of the photos, I saw the SD card in the nightstand next to what appeared to be the silver Sony model DSC-3000 digital camera. Based on the metadata associated with the aforementioned images, I understand this to be the camera used to take the images. The camera was inadvertently not seized during the execution of the prior federal warrant.

#### **CONCLUSION**

- 23. Based on the foregoing, I respectfully submit that there is probable cause to believe that the aforementioned federal statutes have been violated and that there is probable cause to believe that evidence of the TARGET OFFENSES can be found in the TARGET LOCATION.
- 24. WHEREFORE, I respectfully request that the attached warrant be issued authorizing the search and seizure of the TAGET LOCATION described in Attachments A-1 and the items described in Attachment B-1.

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Richard P. Federico Special Agent

Homeland Security Investigations

Sworn and subscribed before me this day of June 2018

HONORABLE J. MARK COULSON

UNITED STATES MAGISTRATE JUDGE

FILED\_ LOGGED\_\_\_\_

JUN 20 2018

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUT